

FILED

OCT 20 2020

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES OF AMERICA

v.

WILLIAM CURTIS LEE, a/k/a "Doc" or "Pluck,"
WILLIAM HOLLEY, JR., a/k/a "Chill,"
ROBERT E. BEELER,

JASON T. NICHOLS, and
TOCCARA L. PORTER

No. 3:20-CR- 97

JUDGES _____ / _____

INDICTMENT

COUNT ONE

The Grand Jury charges that, from on or about January 1, 2020, through on or about October 20, 2020, within the Eastern District of Tennessee and elsewhere, the defendants, WILLIAM C. LEE, a/k/a "Doc" or "Pluck," WILLIAM HOLLEY, JR., a/k/a "Chill," ROBERT E. BEELER, [REDACTED] JASON T. NICHOLS, and TOCCARA L. PORTER, and other persons known and unknown to the Grand Jury, did knowingly, intentionally, and without authority combine, conspire, confederate and agree with each other and with diverse others to distribute one hundred (100) grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, forty (40) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, and ten (10) grams of more of a mixture and substance containing a detectable amount of N-(1-phenethylpiperidin-4-yl)-N-phenylacetamide (acetyl fentanyl), a Schedule I controlled substance and analogue of fentanyl, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT TWO

The Grand Jury further charges that, from on or about July 1, 2020, through on or about October 20, 2020, within the Eastern District of Tennessee and elsewhere, the defendants, WILLIAM C. LEE, a/k/a “Doc” or “Pluck,” WILLIAM HOLLEY, JR., a/k/a “Chill,” and TOCCARA L. PORTER, did knowingly, intentionally, and without authority combine, conspire, confederate and agree with each other and with diverse others to distribute fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

NOTICE OF ENHANCED PENALTY UNDER TITLE 21 U.S.C. § 841(b)(1)(A)

(Prior Conviction of Serious Violent Felony)

Before committing the offenses charged in Counts One and Two of this Indictment, the defendant, WILLIAM HOLLEY, JR., a/k/a “Chill,” had at least one final conviction for a serious violent felony, for which he served at least 12 months in custody and was released from custody no more than 15 years before the commencement of the offenses charged in Counts One and Two. As a result, the defendant, WILLIAM HOLLEY, JR., a/k/a “Chill,” is subject to an enhanced penalty under Title 21, United States Code, Sections 841(b)(1)(A), 841(b)(1)(B) and 851.

COUNT THREE

The Grand Jury further charges that, on or about August 4, 2020, in the Eastern District of Tennessee, the defendant, ROBERT E. BEELER, did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(A).

COUNT FOUR

The Grand Jury further charges that, on or about August 4, 2020, in the Eastern District of Tennessee, the defendant, ROBERT E. BEELER, did knowingly possessed firearms in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute controlled substances and possession with intent to distribute a controlled substance as set forth in Counts One and Three of this Indictment, the description of which is fully incorporated herein, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE

The Grand Jury further charges that on or about August 4, 2020, in the Eastern District of Tennessee, the defendant, ROBERT E. BEELER, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess firearms and ammunition, and those firearms and ammunition having been transported in interstate commerce, in violation Title 18, United States Code, Section 922(g)(1).

DRUG TRAFFICKING FORFEITURE ALLEGATIONS

The allegations contained in Counts One, Two, and Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 846 and/or 841, the defendants, WILLIAM C. LEE, a/k/a "Doc" or "Pluck," WILLIAM HOLLEY, JR., a/k/a "Chill," [REDACTED] and ROBERT E. BEELER, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in

any manner or part, to commit, or to facilitate the commission of the offense, including but not limited to the following:

Money Judgment

Proceeds the defendants, WILLIAM C. LEE, a/k/a "Doc" or "Pluck," WILLIAM HOLLEY, JR., a/k/a "Chill," [REDACTED] and ROBERT E. BEELER, personally obtained as a result of the violations of Title 21, United States Code, Sections 841 and/or 846.

Pursuant to Title 21, United States Code, Section 853(p), the defendant shall forfeit substitute property, up to the value of the property subject to forfeiture, if by any act or omission of the defendant, the property, or any portion thereof:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty.

FIREARM FORFEITURE ALLEGATIONS

The allegations contained in Counts Four and Five of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense in violation of Title 18, United States Code, Sections 922(g)(1) and/or 924(c)(1)(A) as set forth in this Indictment, the defendant, ROBERT E. BEELER, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), defendants shall forfeit substitute property, up to the value

of the property subject to forfeiture, if by any act or omission of the defendant, the property, or any portion thereof:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL:

SIGNATURE REDACTED

GRAND JURY FOREPERSON

J. DOUGLAS OVERBEY
UNITED STATES ATTORNEY



BRENT N. JONES
Assistant United States Attorney

CRIMINAL CASE COVER SHEET**U.S. ATTORNEY'S OFFICE**

Place of Offense (City & County): Knoxville, Knox County

Defendant Information:

Juvenile _____ Yes X No Matter to be Sealed: X Yes _____ NoDefendant Name: William Curtis Lee, a/k/a "Doc" or "Pluck"Interpreter: No X Yes _____ Language _____Total # of Counts: _____ Petty _____ Misdemeanor (Class _____) 2 Felony

	<u>ORIGINAL</u> U.S.C. Citation(s) and Description of Offense Charged	Count(s)
Set 1	Conspiracy to distribute 100 grams or more of a mixture and substance containing heroin, 40 grams or more of a mixture and substance containing fentanyl, and 10 grams or more of a mixture and substance containing acetyl fentanyl; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)	1
Set 2	Conspiracy to distribute 50 grams or more of actual methamphetamine; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)	2

	<u>SUPERSEDING INDICTMENT</u> U.S.C. Citation(s) and Description of Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1				

Current Trial Date (if set): _____ before Judge _____

Criminal Complaint Filed: No _____ Yes _____ Case No. _____

Related Case(s):

Case Number _____ Defendant's attorney _____ How related _____

Criminal Informations:

Pending criminal case: No _____ Yes _____ Case No. _____

New Separate Case _____ Supersedes Pending Case _____

Name of defendant's attorney: _____

Retained: _____ Appointed: _____

Date: 10/20/2020 Signature of AUSA: B.N.C.

CRIMINAL CASE COVER SHEET**U.S. ATTORNEY'S OFFICE**

Place of Offense (City & County): Knoxville, Knox County

Defendant Information:

Juvenile _____ Yes X No Matter to be Sealed: X Yes _____ NoDefendant Name: William Holley, Jr., a/k/a "Chill"Interpreter: No X Yes _____ Language _____Total # of Counts: _____ Petty _____ Misdemeanor (Class _____) 2 Felony

	<u>ORIGINAL</u> U.S.C. Citation(s) and Description of Offense Charged	Count(s)
Set 1	Conspiracy to distribute 100 grams or more of a mixture and substance containing heroin, 40 grams or more of a mixture and substance containing fentanyl, and 10 grams or more of a mixture and substance containing acetyl fentanyl; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)	1
Set 2	Conspiracy to distribute 50 grams or more of actual methamphetamine; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)	2

	<u>SUPERSEDING INDICTMENT</u> U.S.C. Citation(s) and Description of Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1				

Current Trial Date (if set): _____ before Judge _____

Criminal Complaint Filed: No _____ Yes _____ Case No. _____

Related Case(s):

Case Number _____ Defendant's attorney _____ How related _____

Criminal Informations:

Pending criminal case: No _____ Yes _____ Case No. _____

New Separate Case _____ Supersedes Pending Case _____

Name of defendant's attorney: _____

Retained: _____ Appointed: _____

Date: 10/20/2020 Signature of AUSA: B.N.G.

CRIMINAL CASE COVER SHEET**U.S. ATTORNEY'S OFFICE**

Place of Offense (City & County): Knoxville, Knox County

Defendant Information:

Juvenile _____ Yes X No Matter to be Sealed: X Yes _____ NoDefendant Name: Robert E. BeelerInterpreter: No X Yes _____ Language _____Total # of Counts: _____ Petty _____ Misdemeanor (Class _____) 4 Felony

	<u>ORIGINAL</u> U.S.C. Citation(s) and Description of Offense Charged	Count(s)
Set 1	Conspiracy to distribute 100 grams or more of a mixture and substance containing heroin, 40 grams or more of a mixture and substance containing fentanyl, and 10 grams or more of a mixture and substance containing acetyl fentanyl; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)	1
Set 2	Possess with intent to distribute 50 grams or more of actual methamphetamine; 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)	3
Set 3	Possession in furtherance of a drug trafficking crime; 18 U.S.C. § 924(c)(1)(A)	4
Set 4	Felon in Possession of a Firearm; 18 U.S.C. § 922(g)(1)	5

	<u>SUPERSEDING INDICTMENT</u> U.S.C. Citation(s) and Description of Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1				

Current Trial Date (if set): _____ before Judge _____

Criminal Complaint Filed: No _____ Yes _____ Case No. _____

Related Case(s):

Case Number _____ Defendant's attorney _____ How related _____

Criminal Informations:

Pending criminal case: No _____ Yes _____ Case No. _____

New Separate Case _____ Supersedes Pending Case _____

Name of defendant's attorney: _____

Retained: _____ Appointed: _____

Date: 10/20/2020 Signature of AUSA: B.N.G.

CRIMINAL CASE COVER SHEET**U.S. ATTORNEY'S OFFICE**

Place of Offense (City & County): Knoxville, Knox County

Defendant Information:

Juvenile _____ Yes X No Matter to be Sealed: X Yes _____ NoDefendant Name: James Canty III, a/k/a "Duke"Interpreter: No X Yes _____ Language _____Total # of Counts: _____ Petty _____ Misdemeanor (Class _____) 1 Felony

	<u>ORIGINAL</u> U.S.C. Citation(s) and Description of Offense Charged	Count(s)
Set 1	Conspiracy to distribute 100 grams or more of a mixture and substance containing heroin, 40 grams or more of a mixture and substance containing fentanyl, and 10 grams or more of a mixture and substance containing acetyl fentanyl; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)	1

	<u>SUPERSEDING INDICTMENT</u> U.S.C. Citation(s) and Description of Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1				

Current Trial Date (if set): _____ before Judge _____

Criminal Complaint Filed: No _____ Yes _____ Case No. _____

Related Case(s):

Case Number _____ Defendant's attorney _____ How related _____

Criminal Informations:

Pending criminal case: No _____ Yes _____ Case No. _____

New Separate Case _____ Supersedes Pending Case _____

Name of defendant's attorney: _____

Retained: _____ Appointed: _____

Date: 10/20/2020 Signature of AUSA: B.L.N. Q.

CRIMINAL CASE COVER SHEET**U.S. ATTORNEY'S OFFICE**

Place of Offense (City & County): Knoxville, Knox County

Defendant Information:

Juvenile _____ Yes X No Matter to be Sealed: X Yes _____ NoDefendant Name: Jason T. NicholsInterpreter: No X Yes _____ Language _____Total # of Counts: _____ Petty _____ Misdemeanor (Class _____) 1 Felony

	<u>ORIGINAL</u> U.S.C. Citation(s) and Description of Offense Charged	Count(s)
Set 1	Conspiracy to distribute 100 grams or more of a mixture and substance containing heroin, 40 grams or more of a mixture and substance containing fentanyl, and 10 grams or more of a mixture and substance containing acetyl fentanyl; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)	1

	<u>SUPERSEDING INDICTMENT</u> U.S.C. Citation(s) and Description of Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1				

Current Trial Date (if set): _____ before Judge _____

Criminal Complaint Filed: No _____ Yes _____ Case No. _____

Related Case(s):

Case Number _____ Defendant's attorney _____ How related _____

Criminal Informations:

Pending criminal case: No _____ Yes _____ Case No. _____

New Separate Case _____ Supersedes Pending Case _____

Name of defendant's attorney: _____

Retained: _____ Appointed: _____

Date: 10/20/2020 Signature of AUSA: B. J. [Signature]

CRIMINAL CASE COVER SHEET**U.S. ATTORNEY'S OFFICE**

Place of Offense (City & County): Knoxville, Knox County

Defendant Information:

Juvenile _____ Yes X No Matter to be Sealed: X Yes _____ NoDefendant Name: Toccara L. PorterInterpreter: No X Yes _____ Language _____Total # of Counts: _____ Petty _____ Misdemeanor (Class _____) 2 Felony

	<u>ORIGINAL</u> U.S.C. Citation(s) and Description of Offense Charged	Count(s)
Set 1	Conspiracy to distribute 100 grams or more of a mixture and substance containing heroin, 40 grams or more of a mixture and substance containing fentanyl, and 10 grams or more of a mixture and substance containing acetyl fentanyl; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)	1
Set 2	Conspiracy to distribute 50 grams or more of actual methamphetamine; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)	2

	<u>SUPERSEDING INDICTMENT</u> U.S.C. Citation(s) and Description of Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1				

Current Trial Date (if set): _____ before Judge _____

Criminal Complaint Filed: No _____ Yes _____ Case No. _____

Related Case(s): _____

Case Number _____ Defendant's attorney _____ How related _____

Criminal Informations:

Pending criminal case: No _____ Yes _____ Case No. _____

New Separate Case _____ Supersedes Pending Case _____

Name of defendant's attorney: _____

Retained: _____ Appointed: _____

Date: 10/20/2020 Signature of AUSA: B.N.D.